

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
AIKEN DIVISION**

<p>SHARON O. SEABROOKS, AS PERSONAL REPRESENTATIVE OF THE ESTATE OF ANTHONY DOPSON,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>STELLANTIS a/k/a STELLANTIS GROUP, a/k/a STELLANTIS US, LLC, a/k/a STELLANTIS NV, a/k/a FCA US LLC, a/k/a FIAT CHRYSLER AUTOMOBILES US, a/k/a FIAT CHRYSLER AUTOMOBILES NV, a/k/a PSA GROUP, a/k/a PEUGEOT SOCIETE ANONYME, f/k/a CHRYSLER GROUP, LLC, f/k/a CHRYSLER, LLC, AND ZF ACTIVE SAFETY AND ELECTRONICS US LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No.: 1:22-cv-02194-MGL</p> <p style="text-align: center;"><b>CONSENT MOTION TO AMEND CASE CAPTION</b></p>
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Plaintiff Sharon O. Seabrooks (“Plaintiff”) by and through her undersigned counsel, hereby moves this Honorable Court to order an amendment of the caption to rename Defendant Stellantis a/k/a Stellantis Group, a/k/a Stellantis US, LLC, a/k/a Stellantis NV, a/k/a FCA US LLC, a/k/a Fiat Chrysler Automobiles US, a/k/a Fiat Chrysler Automobiles NV, a/k/a PSA Group, a/k/a Peugeot Societe Anonyme, f/k/a Chrysler Group, LLC, f/k/a Chrysler, LLC to FCA US LLC. In Defendant FCA US LLC’s (“FCA”) Answers to Rule 26.01 Interrogatories [ECF 34] FCA states that they are improperly identified and further states that the proper name of the corporate entity related to the allegations directed to the vehicle manufacturer in this case is FCA US LLC. As such, the additional names of the various a/k/a and f/k/a entities should be removed and the entity identified only as FCA US LLC.

Further, several named ZF entity Defendants were dismissed on September 2, 2022 [ECF 26] which previously removed those Defendants from the caption.

Plaintiff respectfully requests the caption read as follows:

SHARON O. SEABROOKS, AS PERSONAL REPRESENTATIVE OF THE ESTATE OF  
ANTHONY DOPSON,

Plaintiff,

v.

FCA US LLC, AND ZF ACTIVE SAFETY AND ELECTRONICS US LLC,

Defendants.

Defendants FCA US LLC and ZF Active Safety and Electronics US LLC consent to this motion.

For the reasons set forth, Plaintiff respectfully requests this Honorable Court to enter an order granting the Consent Motion to Amend Case Caption.

Respectfully submitted this 11<sup>th</sup> day of October 2022,

*[Signature page to follow]*

**WE CONSENT:**

s/Kevin R. Dean

Kevin R. Dean, Esq.  
Lee M. Heath, Esq.  
Motley Rice LLC  
28 Bridgeside Blvd.  
Mount Pleasant, SC 29464  
P: (843) 216-9000  
F: (843) 216-9450  
[kdean@motleyrice.com](mailto:kdean@motleyrice.com)  
[lheath@motleyrice.com](mailto:lheath@motleyrice.com)

*Attorneys for the Plaintiff*

s/Daniel B. White

Daniel B. White, Esq.  
William P. Maurides, Esq.  
Gallivan, White & Boyd, P.A.  
55 Beattie Place, Ste. 1200  
Greenville, SC 29601  
(Box 10589, Greenville, SC 29603)  
P: (864) 271-5342  
F: (864) 271-7502  
[DWhite@GWBlawfirm.com](mailto:DWhite@GWBlawfirm.com)  
[WMaurides@GWBlawfirm.com](mailto:WMaurides@GWBlawfirm.com)

David R. Tippetts, Esq. *Admitted PHV*  
Philip McDaniel, Esq.  
Weinstein, Tippetts & Little, LLP  
7500 San Felipe St., Ste. 500  
Houston, TX 77063  
P: (713) 422-0800  
F: (713) 244-0801  
[David.Tippetts@wtllaw.com](mailto:David.Tippetts@wtllaw.com)  
[Philip.McDaniel@wtllaw.com](mailto:Philip.McDaniel@wtllaw.com)

*Attorneys for Defendant ZF Active Safety and  
Electronics US, LLC*

s/James B. Hood

James B. Hood, Esq.  
John O'Connor Radeck, Jr., Esq.  
Hood Law Firm, LLC  
172 Meeting Street  
Charleston, SC 29401  
P: (843) 577-4435  
F: (843) 722-1630  
[James.hood@hoodlaw.com](mailto:James.hood@hoodlaw.com)  
[John.Radeck@hoodlaw.com](mailto:John.Radeck@hoodlaw.com)

Andrew M. Mast, Esq. *Admitted PHV*  
William E. McDonald, III, Esq., *Adm. PHV*  
Bush Seyferth PLLC  
100 West Big Beaver, Ste. 400  
Troy, MI 48084  
P: (248) 822-7807  
F: (248) 822-7807  
[mast@bsplaw.com](mailto:mast@bsplaw.com)  
[mcdonald@bsplaw.com](mailto:mcdonald@bsplaw.com)

*Attorneys for Defendant FCA US LLC*